

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 21-cr-10104-PBS
	)	
VLADISLAV KLYUSHIN	)	
Defendant	)	
_____	)	

**WITNESS LIST**

The defendant Vladislav Klyushin, by and through undersigned counsel, hereby respectfully advises the Court that the following individuals may be called as witnesses during Mr. Klyushin's case-in-chief:

1. David Tawil – Ocean, NJ
2. J-Michael Robert – Corvus Forensic, Brooklyn, NY
3. Michael Cullan – Brooklyn, NY
4. Vladislav Klyushin

Mr. Klyushin reserves the right to call additional witnesses, including witness for which the government has yet to produce interview notes or reports, and, rebuttal witness, if and when he determines they will be required.

Respectfully Submitted,  
Vladislav Klyushin,  
By His Attorney,

**/s/ Maksim Nemtsev**  
Maksim Nemtsev, Esq.  
Mass. Bar No. 690826  
20 Park Plaza, Suite 1000  
Boston, MA 02116  
(617) 227-3700  
menemtsev@gmail.com

**/s/ Marc Fernich**  
Marc Fernich  
Law Office of Marc Fernich  
800 Third Avenue  
Floor 20  
New York, NY 10022  
212-446-2346  
Email: maf@fernichlaw.com

Dated: January 23, 2023

**CERTIFICATE OF SERVICE**

I, Maksim Nemtsev, hereby certify that on this date, January 23, 2023, a copy of the foregoing documents has been served via Electronic Court Filing system on all registered participants.

**/s/ Maksim Nemtsev**  
Maksim Nemtsev, Esq.